Ser. No. 09/784,660
Response dated May 20, 2004
Reply to final Office Action of March 24, 2004

## REMARKS

This is in response to the final Office Action mailed March 24, 2004.

In the final Office Action, Applicant's Claims 1-18, 20 and 21 were allowed.
Applicant gratefully acknowledges the allowance of these claims.

In the final Office Action, Applicant's Claim 19 was rejected as obvious over the
combination of U.S. Pat. No. 6,112,174 ("Wakisaka") and U.S. Pat. No. 5,974,419
("Ashby"). Applicant respectfully traverses this rejection. Applicant submits that Claim
19 is not obvious over the combination of Wakisaka and Ashby because the combination
of these references fails to disclose all the limitations recited in the claim.
Reconsideration of the present application is respectfully requested.

Applicant's Claim 19 relates to a system that provides geographic information
and includes *inter alia* an *"automatic speech recognition system."* The *"automatic
speech recognition system"* of Applicant's Claim 19 uses a *"word list"* containing *"data
representations of spoken names of geographic features."* In order to facilitate
recognition of names of geographic features, the number of words in the *"word list"* is
*"only a portion of all available data representations of spoken names of geographic
features."* Specifically, the *"word list"* contains two parts. A *"first part"* *"changes to
include different words as the vehicle travels in the region"* and includes *"words"* for
*"names of geographic features in proximity to the current location of the vehicle."* A
*"second part"* of the *"word list"* *"does not change . . . as the vehicle travels"* and
includes *"words for names of selected geographic features located throughout the
region."* Applicant's Claim 19 further recites that both the *"first part"* and the *"second
part"* are available to the *"automatic speech recognition system"* *"at the same time"* so
that the words in either *"list"* can be recognized. This allows for recognition of names
for geographic features located in proximity to the vehicle as well as recognition of
names for <u>selected</u> geographic features (such as popular destinations) <u>not</u> located in
proximity to the vehicle.

Page 7 of 11

Ser. No. 09/784,660
Response dated May 20, 2004
Reply to final Office Action of March 24, 2004

Wakisaka relates to a car navigation system that includes a speech recognition system. The speech recognition system disclosed by Wakisaka uses a plurality of separate data dictionaries containing words for place names for speech recognition purposes. Each dictionary contains the names of places located in corresponding separate geographic areas. As the vehicle travels, the Wakisaka speech recognition system selects the appropriate dictionary to use for speech recognition purposes based on the location of the vehicle. Wakisaka discloses using only one dictionary at a time, i.e., by selecting only one dictionary to be stored in a second storage section based on the location of the vehicle. (See, Wakisaka: column 2, lines 50-53.) Since each dictionary in Wakisaka corresponds to a separate geographic area and since Wakisaka uses only one dictionary at a time, the words and sentences available for speech recognition are limited to those in the geographic area around the vehicle. Therefore, Wakisaka does not disclose the limitation recited in Applicant's Claim 19 of a *"second part"* of a *"word list"*, wherein the *"second part" "does not change . . . as the vehicle travels"* and wherein the *"second part"* contains *"data representations of spoken names of selected geographic features"* that are *"located throughout the region."*

Ashby relates to a method of organizing geographic data in a database that is stored on a relatively slow medium, such as a CD-ROM disk, to improve performance by systems that use the data to provide navigation-related features. (Ashby: column 4, lines 12-18.) Ashby teaches that geographic data can be organized into separate collections based on the different functions performed by the navigation system. (Ashby: column 5, lines 38-42.) Ashby teaches that the data in some of these separate collections can be further separated into layers (Ashby: column 6; line 63-column 7, line 67) and that some of these layers can be still further separated into "parcels" (Ashby: column 8, lines 1-7). According to Ashby, the data corresponding to each "parcel" of data is stored together separately on a data storage medium, such as a CD-ROM disk, and represents the minimum amount of data that is accessed at one time when the disk is accessed. (Ashby: column 8, lines 8-24; column 20, line 57-column 21, line 8.)

As stated above, Applicant's Claim 19 is not obvious over the combination of Wakisaka and Ashby because all the elements of Claim 19 are not disclosed by these

Ser. No. 09/784,660
Response dated May 20, 2004
Reply to final Office Action of March 24, 2004

references. Specifically, the combination of Wakisaka and Ashby does not disclose the limitation recited in Applicant's Claim 19 of a *"second part"* of a *"word list"* that *"does not change . . . as the vehicle travels"* and that contains *"data representations of spoken names of selected geographic features"* that are *"located throughout the region."* As previously pointed out, Wakisaka discloses a plurality of speech-recognition dictionaries, each of which contains a separate collection of words for the names of geographic places located in a corresponding one of a separate plurality of distinct geographic areas into which a region is divided. However, Wakisaka discloses using only one speech-recognition dictionary at a time and changing from one dictionary to another as the vehicle moves from one of the corresponding geographic areas to another. Thus, Wakisaka fails to disclose the limitation recited in Applicant's Claim 19 of a *"second part"* of a *"word list"* that *"does not change . . . as the vehicle travels"* and that contains *"data representations of spoken names of selected geographic features"* that are *"located throughout the region."*

Referring to Ashby, the Ashby patent also does not disclose the limitation recited in Applicant's Claim 19 of a *"second part"* of a *"word list"* that *"does not change . . . as the vehicle travels"* and that contains *"data representations of spoken names of selected geographic features"* that are *"located throughout the region."* First of all, Ashby has no specific disclosure relating to storage of data used for speech recognition purposes. Instead, Ashby discloses a method for grouping geographic data into parcels and storing the parcels on a medium, such as a CD-ROM disk, to improve performance when accessing the data. The data organization method disclosed by Ashby *could be* applied to the storage of speech-recognition dictionaries, as taught by Wakisaka. However, even if the Ashby data organization method were applied to the storage of the Wakisaka speech-recognition dictionaries, Ashby includes no disclosure suggesting that the *contents* of any of the speech-recognition dictionaries (or parcels) so formed include a *"second part"* of a *"word list"* that *"does not change . . . as the vehicle travels"* and that contains *"data representations of spoken names of selected geographic features"* that are *"located throughout the region"*, as recited in Applicant's Claim 19. Accordingly, even if the Wakisaka and Ashby were combined, the resultant combination would still fail to

Page 9 of 11

Ser. No. 09/784,660
Response dated May 20, 2004
Reply to final Office Action of March 24, 2004

disclose the *"second part"* of a *"word list"* that *"does not change . . . as the vehicle travels"* and that contains *"data representations of spoken names of selected geographic features"* that are *"located throughout the region"*, as recited in Applicant's Claim 19. Therefore, Applicant's Claim 19 is not obvious over the combination of Wakisaka and Ashby.

According to the final Office Action mailed March 24, 2004, the combination of Wakisaka and Ashby discloses all the features of Applicant's Claim 19. According to the final Office Action, Ashby (column 5, lines 38-42) describes a system for parcelization of geographic data for storage and use in a navigation system that simultaneously represents both destination and present positions. According to the final Office Action, the destination information disclosed by Ashby corresponds to the portion of Applicant's Claim 19 that recites a *"second part"* that *"does not change . . . as the vehicle travels"* and includes *"data representations of spoken names of selected geographic features"* that are *"located throughout the region."*

The position expressed in the final Office Action misinterprets the Ashby patent. Although Ashby teaches a method for organizing geographic data into parcels for storage on a medium for subsequent use in a navigation system, Ashby does not include any specific teaching relating to the *contents* of parcels of data used for speech recognition purposes. The passages from Ashby cited in the final Office Action (i.e., column 2, lines 42-46; column 5, lines 30-36; and column 5, lines 38-42) do not relate to data used for speech recognition purposes. Moreover, these passages do not support the position that it would be obvious to one of ordinary skill in the art to modify the Wakisaka speech recognition system, which includes separate data dictionaries containing words for places located in separate corresponding geographic areas, to include *another entirely new* data dictionary that includes words for places *"located throughout the region"*, as recited in Applicant's Claim 19.
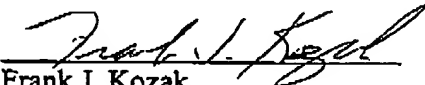
## Conclusion

Applicant has shown that the rejection of Claim 19 in the final Office Action mailed March 24, 2004 should be withdrawn. Applicant submits that the present

Page 10 of 11

Ser. No. 09/784,660
Response dated May 20, 2004
Reply to final Office Action of March 24, 2004

application is in condition for allowance. If any issues remain, the Examiner is invited to

call the undersigned at the telephone number below.

Respectfully submitted,

Frank J. Kozak
Reg. No. 32,908
Chief Intellectual Property Counsel


NAVIGATION TECHNOLOGIES CORPORATION
222 Merchandise Mart Plaza, Suite 900
Chicago, IL 60654
(312) 894-7000 x7371

Page 11 of 11